

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 19-cr-20652

v.

Hon. David M. Lawson

D-3 Rami Lazeki,

Defendant.

DISCOVERY NOTICE

1. The attorney for the government knows that the defendant made relevant written or recorded statements (including grand jury testimony).
2. The attorney for the government knows that defendant has a prior criminal record:

NO X YES

3. The following books, papers, documents, photographs, and tangible objects are within the possession, custody, or control of the government and are intended to be used as evidence in chief at trial, are known to the government to be material to the preparation of the defense, or were obtained from or belong to the defendant:
 - Documents and billing data provided by Medicare and/or Medicare contractors;
 - Records obtained from relevant State Agencies;
 - Records obtained from financial institutions or financial regulators;
 - Payroll records;
 - Phone records;
 - Recordings;

- Evidence obtained from cooperating witnesses;
- Evidence or photographs obtained during surveillance and other investigative activities;
- Photographs of premises taken during execution of search warrants;
- Items seized during the execution of search warrants at the following locations:

Date	Address	Docket Number
05/02/2017	Great Lakes Medical Pharmacy d/b/a All American Medical Pharmacy 23247 Pinewood Street , Warren, MI 48091	17-mc-50619
05/03/2017	All American Medical Supplies 3620, 3640, and 3660 Enterprise Way Miramar, FL 33025	17-mc-60170
06/05/2019	Information Associated with All American Medical Pharmacy that is stored at premises controlled by Carepoint	17-mc-50617-01

including patient files, financial documents, corporate documents, activity logs, business records, employee files, correspondence, electronic media and storage devices, accounting records, and other miscellaneous items and documents.

4. Results or reports of the following physical or mental examinations, or scientific tests or experiments, are within the possession, custody, or control of the government, and are either intended to be used as evidence in chief at trial or are known to the government to be material to the preparation of the defense: Not applicable.
5. The government intends to introduce at trial testimony from one or more experts in the following areas of expertise: Not applicable at this time.
6. The government may introduce evidence obtained from the execution of the following search warrants:

Date	Address	Docket Number
-------------	----------------	----------------------

05/02/2017	Great Lakes Medical Pharmacy d/b/a All American Medical Pharmacy 23247 Pinewood Street , Warren, MI 48091	17-mc-50619
05/03/2017	All American Medical Supplies 3620, 3640, and 3660 Enterprise Way Miramar, FL 33025	17-mc-60170
06/05/2019	Information Associated with All American Medical Pharmacy that is stored at premises controlled by Carepoint	17-mc-50617-01

7. The government may introduce evidence obtained through wiretaps or other electronic surveillance:

Type (wiretap, bug, ect.) Docket Number(s) Not Applicable X

8. The government intends to offer evidence under Fed. R. Evid. 404(b).

NO _____ YES _____ Unsure X

9. The attorney for the government is aware of the obligations imposed by Brady v. Maryland, 373 U.S. 83 (1963), and its progeny and will comply with their obligation to provide defense counsel with exculpatory evidence that is material to either guilt or punishment in time for effective use at trial.

If the government discovers additional information of the type described in Paragraphs One through Nine, it will advise defense counsel in writing.

Upon specific request of the defendant, the government will make available for inspection or copying the items described in Paragraphs One, Three, and Four; will furnish the record referred to in Paragraph Two; will provide a summary (which will include the witnesses' qualifications, opinions, and the bases and reasons for the opinions) of the anticipated testimony described in Paragraph Five; and will provide notice of the general nature of the evidence referred to in Paragraph Eight.

The government's compliance with any specific request will trigger the defendant's duty to provide the reciprocal discovery denoted in Fed. R. Crim. P. 16(b)(1)(A)-(C). If the defendant makes a general request for discovery, the government will

construe it as a request for each item described in Fed. R. Crim. P. 16(a)(1)(A)-(E). The government's compliance with the defendant's general request will trigger the defendant's duty to provide reciprocal discovery of each item specified in Fed. R. Crim. P. 16(b)(1)(A)-(C).

Matthew Schneider
United States Attorney

s/ Malisa Dubal
Malisa Dubal
Trial Attorney
U.S. Department of Justice
Criminal Division, Fraud Section
211 West Fort Street, Suite 2001
Detroit, MI 48226
202-660-2001
Malisa.Dubal@usdoj.gov

Dated: October 22, 2019

CERTIFICATE OF SERVICE

I hereby certify that, on October 22, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record who receive electronic notifications.

s/ Malisa Dubal

Malisa Dubal

Trial Attorney

U.S. Department of Justice

Criminal Division, Fraud Section

211 West Fort Street, Suite 2001

Detroit, MI 48226

202-660-2001

Malisa.Dubal@usdoj.gov